REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-41, 43-100, and 102-109 are pending in the present application. No claims are amended, added, or canceled by the present response.

In the outstanding Office Action, Claims 1, 11, and 25 were rejected under 35 U.S.C. § 112, second paragraph, and Claims 1-41, 43-100, and 102-109 were rejected under 35 U.S.C. § 103(a) as unpatentable over <u>Fairchild et al.</u> (U.S. Patent No. 6,343,320, herein "Fairchild") in view of <u>Fan et al.</u> (U.S. Patent No. 6,310,692, herein "<u>Fan</u>").

Regarding the rejection of Claims 1, 11, and 25 under 35 U.S.C. § 112, second paragraph, Applicants respectfully submit that Claim 1 recites "an information collection unit configured to collect related information ... when apparatus information is received ... from said initiating apparatus ... to be remotely controlled." Thus, the initiating apparatus initiates a remote control operation by the central control system. The same arguments apply for independent Claims 11 and 25. Regarding dependent Claim 2, Applicants respectfully submit that Figure 1 shows the remote control system 1 and the plurality of apparatuses 13, 14, 15, 23, and 24, and Figure 2 shows the remote control system 1 and the terminal units 7a-7n. Therefore, it is respectfully requested this rejection be withdrawn.

Regarding the rejection of Claims 1-41, 43-100, and 102-109 under 35 U.S.C. § 103(a) as unpatentable over <u>Fairchild</u> and <u>Fan</u>, that rejection is respectfully traversed for the following reasons.

Briefly recapitulating, independent Claim 1 is directed to a remote control system that includes a central control system and an information collection unit. The remote control system controls a plurality of apparatuses divided into a predetermined number of groups.

When apparatus information is received by the central control system from an initiating apparatus to be remotely controlled, the information collection unit collects related information from all the plurality of apparatuses except a group corresponding to the initiating apparatus. In other words, if one apparatus 13 of a first group A shown in a non-limiting example in Figure 1, sends apparatus information indicating a need that the initiating apparatus 13 be remotely controlled by the central control system 1, then the information collection unit of the central system 1 collects related information from all apparatuses 23 and 24 except the apparatuses 14 and 15 of the group A corresponding to the initiating apparatus 13. Independent Claims 11, 25, 26, 30, 34, 43, 50, 51, 55, 67, 68, 78, 92, 93, 102, and 109 recite similar features as Claim 1.

Turning to the applied art, the outstanding Office Action states in the paragraph bridging pages 3 and 4 that <u>Fairchild</u> discloses at column 10, line 56, to column 11, line 2, at column 6, lines 25-45, and at column 15, lines 35-48, the above noted claimed features. The disclosure of <u>Fairchild</u> identified by the outstanding Office Action will be discussed in turn.

Fairchild shows in Figure 3 a network 300 having various management servers 102 and 314 and a plurality of network elements 302 connected to the management servers 102 and 314. Further, Fairchild discloses at column 10, line 56, to column 11, line 2, that an "appropriate discovery procedure is preformed to enable each management server ... to communicate with managed devices within the network 300, such as any NPDs 302." Furthermore, Fairchild discloses that each management server "sends information via its corresponding subnet to the routers 312 to inform the NPDs of server information." However, the independent claims recite that information is *collected* by the network from the plurality of apparatuses and not the other way around.

In addition, <u>Fairchild</u> discloses at column 6, lines 25-45 that the "management server 102 periodically collects and saves configuration information in database 128" and that "[t]he management server 102 enables the user to select a managed element 104 and view detailed information about the device." However, Applicants respectfully submit that the claimed remote control system does not *periodically* collect and save configuration information but only "when apparatus information is received by said central control system from said initiating apparatus ... to be remotely controlled" (emphasis added). Therefore, the claimed central control system conditionally collects information when an initiating apparatus initiates a procedure of being remotely controlled by the central control system.

Moreover, <u>Fairchild</u> discloses at column 15, lines 35-48 that "NDP 302 performs initialization and sets up one or more groups and corresponding server information as indicated by block 502." In the same paragraph, <u>Fairchild</u> clarifies that the NPD 302 performs initialization "to include an address, name and port number for each management server and for each group." However, <u>Fairchild</u> does not teach or suggest that an initialization of the NPD 302 triggers the server 102 or 314 to collect information from the other NDPs 302, as requested by the independent claims.

In other words, the remote control system of Figure 1 is triggered to collect information from a plurality of apparatuses excluding a group corresponding to an initiating apparatus *when* information is received by the central control system from the initiating apparatus to be remotely controlled. This conditional collection of information by the claimed remote control system is neither taught nor disclosed by <u>Fairchild</u>.

The outstanding Office Action relies on <u>Fan</u> for teaching a remote control system for controlling image forming apparatuses. However, <u>Fan</u> does not overcome the deficiencies of <u>Fairchild</u> discussed above.

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Accordingly, it is respectfully submitted that independent Claims 1, 11, 25, 26, 30, 34, 43, 50, 51, 55, 67, 68, 78, 92, 93, 102, and 109 and each of the claims depending therefrom patentably distinguish over <u>Fairchild</u> and <u>Fan</u>, either alone or in combination.

Consequently, in light of the above discussion, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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